

1 George Haines, Esq.
2 Nevada Bar No. 9411
3 Gerardo Avalos, Esq.
4 Nevada Bar No. 15171
5 **FREEDOM LAW FIRM**
6 8985 S. Eastern Ave, Suite 350
7 Las Vegas, Nevada 89123
8 (702) 880-5554
9 (702) 385-5518 (fax)
10 Ghaines@freedomlegalteam.com
11 *Counsel for Plaintiff Timothy Texeira*

12
13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 Timothy Texeira,

16 Plaintiff,

17 v.

18 National Consumer Telecom & Utilities
19 Exchange, Inc.; Lac du Flambeau Band
20 of Lake Superior Chippewa Indians dba
21 Niizhwaaswi, LLC dba Loan at Last;
22 CNU Online Holdings; DirecTV, LLC;
23 One Main Financial Group, LLC;
24 AT&T Corp dba AT&T uVerse; Clarity
25 Services Inc.; Backgroundchecks.com
26 LLC,

27 Defendants.

Case No.: 2:22-cv-00153-GMN- DJA

**Unopposed Motion for Extension
of Time for Defendant Lac du
Flambeau Band of Lake Superior
Chippewa Indians dba Niizhwaaswi,
LLC dba Loan at Last to File a
Responsive Pleading to Plaintiff's
Complaint**

(First Request)

1 Timothy Texeira ("Plaintiff"), by and through counsel, hereby files his
2 Unopposed Motion for Extension of Time For Lac du Flambeau Band of Lake
3 Superior Chippewa Indians dba Niizhwaaswi, LLC dba Loan at Last
4 ("Defendant") to File a Responsive Pleading to Plaintiff's Complaint, and
5 requests an order extending the deadline for AHFC to file a responsive
6 pleading to Plaintiff's Complaint by thirty (30) days, from the current deadline
7 of April 4, 2022 to **May 4, 2022**. This motion is submitted in compliance with
8 LR IA 6-1 and LR IA 6-2.

9 Good cause exists for the requested extension, as counsel for Defendant
10 is in the process of obtaining and reviewing the relevant file materials and
11 information necessary to respond to the allegations set forth in the Complaint.

12 Additionally, the parties are actively engaged in settlement negotiations
13 and hope to resolve the matter prior to incurring further litigation expenses.

14 The parties agree that an extension of Defendant's time to answer the
15 complaint furthers the interests of this litigation. Accordingly, Plaintiff does
16 not oppose the requested extension and the extension is not being requested in
17 bad faith or to delay these proceedings unnecessarily.

18 This is the first request for an extension of Defendant's responsive
19 pleading deadline.

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26

27

1 For the foregoing reasons, Plaintiff requests that the Court issue an
2 order extending the date, to **May 4, 2022**, on which Defendant must answer or
3 otherwise respond to Plaintiff's Complaint.

4
5 Dated: March 21, 2022.

6
7 **FREEDOM LAW FIRM**

8 /s/ Gerardo Avalos
9 Gerardo Avalos, Esq.
10 8985 S. Eastern Ave., Suite 350
11 Las Vegas, NV 89123
12 *Attorney for Plaintiff Timothy Texeira*

13
14 IT IS SO ORDERED:

15 
16 _____
17 DANIEL J. ALBREGTS
18 UNITED STATES MAGISTRATE JUDGE

19 DATED: March 22, 2022
20
21
22
23
24
25
26
27